

# EXHIBIT 3



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April 21, 2022

*Sent via e-mail at [cmarkos@williamscedar.com](mailto:cmarkos@williamscedar.com)*

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Richard A. Raiders  
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RE: Ellen Gerhart, et al. v. Energy Transfer Partners, L.P., et al.  
Middle District Docket No. 1:17-vc-01726  
Our File No: 1020.7346

Dear Attorneys Markos and Raiders:

I am in receipt of Plaintiffs' Amended Third Set of Requests for Production for Documents Directed at Defendant TigerSwan and Plaintiffs' Requests for Admissions Directed to Defendant TigerSwan, which were served on April 13, 2022. We have been discussing these requests with my client and I am writing to advise you that TigerSwan objects to these additional discovery requests and will not be responding to these requests as they are outside of the current discovery deadline and contrary to the agreements made amongst counsel when the discovery deadline had been extended for primarily the benefit of your clients. *See* Doc. 122 at ¶ 32; *see also* Doc. 123 at ¶ 2; *see also* Doc. 131.

As you are aware the current discovery deadline is May 2, 2022. Accordingly, the responses to these requests are due outside the current discovery deadline. Moreover, my client has expended a significant amount of time and expense in attempting to comply to the previously served Corporate Designee notice, which was extensive as well as the two previous set of document requests. The third set of document requests we have received again ask our clients to engage in extensive e-mail searches, but this time at the eleventh hour. These requests are too

late and they place an unreasonable burden and hardship on my client. Therefore, TigerSwan will not be responding to these requests.

Thank you for your attention to this matter. If you would like to discuss this further, please reach out.

Very truly yours,

*S/Frank J. Lavery, Jr.*

Frank J. Lavery, Jr.

FJL/alp

cc: Christopher P. Gerber, Esquire (via email)  
Connie E. Henderson, Esquire (via email)  
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